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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

UNITED STATES OF AMERICA, )  
 )  
Plaintiff, )  
 )  
vs. )  
 )  
CHARLES PARKIN, )  
 )  
Defendant. )  
\_\_\_\_\_

CASE NO. 2:15-CR-00212-JCM-NJK

**STIPULATION TO CONTINUE SENTENCING HEARING  
(First Request)**

IT IS HEREBY STIPULATED AND AGREED, between the United States of America, by and through its attorney, Christopher Chiou, Acting United States Attorney, through Simon Kung, Assistant United States Attorney; and Defendant Charles Parkin, by and through his counsel, Russell E. Marsh, Esquire, Wright Marsh & Levy, that the Sentencing Hearing currently scheduled for April 7, 2021, be vacated and set to a date and time convenient to this Court, but no sooner than 35 days from the current hearing date, to a new date of May 12, 2021, or later.

This stipulation is entered into for the following reasons:

1. This matter is currently set for Sentencing on April 7, 2021, at 10:30 a.m. (ECF Nos. 121, 123.)
2. Counsel for Mr. Parkin has had to travel out of state for a family medical emergency, and will be unavailable to work on this matter for an undetermined time. Counsel also requires

1 additional time to prepare the Sentencing Memorandum and to gather letters of support and other  
2 documents for sentencing.

3 3. The parties agree to continue the Sentencing Hearing for five weeks. Mr. Parkin is  
4 out of custody and agrees to the continuance.

5 4. Additionally, denial of this request for continuance could result in a miscarriage of  
6 justice.

7 5. The additional time requested by this Stipulation is made in good faith and not for  
8 purposes of delay.

9 6. This is the first request for a continuance of the Sentencing Hearing.

10 Dated this 29th day of March, 2021.

11 Respectfully submitted:

12 WRIGHT MARSH & LEVY

CHRISTOPHER CHIOU  
ACTING UNITED STATES ATTORNEY

13  
14 BY /s/ Russell E. Marsh  
15 RUSSELL E. MARSH, ESQUIRE  
Attorney for Defendant Parkin

BY /s/ Simon Kung  
SIMON KUNG  
Assistant U.S. Attorney

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

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CHARLES PARKIN,

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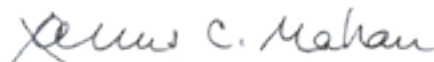
CASE NO. 2:15-CR-00212-JCM-NJK

**ORDER**

Based on the Stipulation of the parties, the Sentencing Hearing in this matter is hereby continued. The ends of justice served by granting said continuance outweigh the best interest of the public and the defendant in a hearing, since the failure to grant said continuance would be likely to result in a miscarriage of justice, and would deny the parties herein sufficient time and the opportunity within which to be able to effectively and thoroughly prepare for the hearing, taking into account the exercise of due diligence.

IS IT HEREBY ORDERED that the Sentencing Hearing in the above-captioned matter currently scheduled for April 7, 2021, at 10:30 a.m., be vacated and continued to May 26, 2021 at 10:00 a.m.

DATED: March 29, 2021.

  
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JAMES C. MAHAN  
United States District Judge